

REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the efforts in examining the pending claims.

Claims 1 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Potter et al. in view of Junkins. In the final action, the office action states that “However, the 3D image of Potter corresponds to the original primitive of the instant invention; and the plurality of triangles defined in 3D space of Potter correspond to the component primitives of the instant invention.” (See page 4 of office action). However, Applicants respectfully submit that a “3D image” is not the same as a “primitive” as required by the claims. If this position is maintained, Applicants respectfully request a showing as to where the prior art teaches such equivalency.

In any event, Applicants have amended the claims to note that the tessellation is based on a controlled tessellation level that defines a number of component primitives included in the plurality of component primitives. By way of example only and not limitation, as noted in Applicants’ Specification, the level with which individual video graphics primitives can be tessellated are controlled such that, for example, only larger or more complex video graphics primitives are tessellated for lighting operations so that the overall display quality can be improved while limiting additional processing bandwidth requirements. (See for example, Specification, page 4, lines 13-17). In addition, the tessellation block may tessellate or not tessellate a video graphics primitive based on control information and the control information may indicate the tessellation level that is to be used on a given video graphics primitive. (See for example, page 9, lines 1-7 of Specification).

The cited references including Junkins fail to teach or suggest such an operation. Applicants respectfully reassert the relevant remarks made in the previous response with respect to Junkins and also respectfully submit that the cited portion merely indicates that a butterfly

subdivision process is performed based on a midpoint of every edge of a subdivision surface. There does not appear to be any teaching or suggestion of the controlled tessellation and controlling of the tessellation levels as claimed. Other distinctions will also be recognized by one of ordinary skill in the art. As such, Applicants respectfully submit that the claims are in condition for allowance.

Claims 2, 5, 9, 22, 24 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Potter in view of Junkins and further in view of Hochmuth et al. Applicants respectfully submit that the dependent claims add additional novel and non-obvious subject matter. The office action alleges that Applicants' remarks with respect to Hochmuth were against the references individually and that one cannot show non-obviousness by attacking references individually. However, Applicants respectfully submit that the remarks were directed to the very portion of the cited reference that was alleged to teach the subject matter used to indicate that the claim was unpatentable and as such, if the cited portion does not teach what is alleged, the claims are allowable. For example, the cited portion of Hochmuth, namely column 6, lines 48-54 refer to a different approach from that set forth, for example, in claim 5. The Hochmuth reference refers to the untessellated vertex and not to subsequently tessellated primitives as required in the claim. If the cited reference does not teach what is alleged, the claims are allowable. In addition, Applicants also respectfully submit that when evaluating the teachings of a reference, the entire reference must be considered and what those teachings would teach to one of ordinary skill in the art. Since Hochmuth does not teach what is alleged in the office action and used as the basis for rejecting Applicants' claims, the claims are in condition for allowance. If the rejection is maintained, Applicants respectfully request a showing as to where the claimed subject matter is taught or suggested in the cited reference.

Claims 3 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable in view of Potter, Junkins and further in view of Gloudemans. Applicants respectfully reassert the relevant remarks made above with respect to the Potter and Junkins reference and as such these claims are also in condition for allowance.

Claims 4 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable in view of Potter, Junkins and further in view of Owen. Applicants respectfully reassert the relevant remarks made above with respect to the Potter and Junkins reference and as such these claims are also in condition for allowance.

Claims 6-8, 11, 13 and 17-19 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable in view of Potter, Junkins and Hochmuth and in further in view of Peercy et al. Applicants respectfully reassert the relevant remarks made above with respect to the Potter and Junkins reference and as such, these claims are also in condition for allowance. Also as to claim 11, Applicants again respectfully reassert the relevant remarks made above and as such this claim is also in condition for allowance.

Claim 14 stands rejected under 35 U.S.C. §103(a) as being unpatentable by Potter in view of Junkins, Hochmuth, Peercy and further in view of Owen. Applicants respectfully reassert the relevant remarks made above and as such these claims are also in condition for allowance.

Claim 16 stands rejected under 35 U.S.C. §103(a) as being unpatentable in view of Potter, Junkins, Hochmuth, Peercy and further in view of Gloudemans. Applicants respectfully reassert the relevant remarks made above and as such these claims are also in condition for allowance.

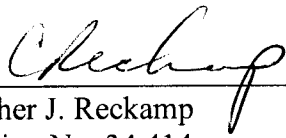
New dependent claim 29 is also believed to be allowable for reasons given above since none of the references alone or in combination appear to teach or suggest the claimed subject matter. Accordingly, this claim is also in condition for allowance.

Applicants also reserve the right to swear behind one or more of the cited references if desired.

Applicants respectfully submit that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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